

EXHIBIT 201

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS

THE STATE OF TEXAS, ET AL. §
§
PLAINTIFFS, § CIVIL ACTION NO. 4:20-CV-00957-
§ SDJ
VS. §
§
GOOGLE LLC, §
§
DEFENDANT. § JURY TRIAL DEMANDED
§
§
§

**THE PLAINTIFF STATES' SEVENTH AMENDED RESPONSES & OBJECTIONS TO
GOOGLE LLC's FIRST SET OF INTERROGATORIES**

The Offices of the Attorney General for the states of Texas, Alaska, Arkansas, Florida, Idaho, Indiana, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nevada, North Dakota, Puerto Rico, South Carolina, South Dakota, and Utah (collectively, the “Plaintiff States”) hereby make the following amended response to Google LLC’s First Set of Interrogatories (the “Interrogatories”) under Federal Rule of Civil Procedure 33 (“Federal Rules”) and any applicable local rules.

- Office of the Lieutenant Governor, Division of Elections
 - Department of Natural Resources (Division of Agriculture, Division of Land and Water)
 - Department of Commerce, Community, and Economic Development (Division of Economic Development (ceased to exist FY22)—still investigating)
 - Department of Revenue (Permanent Fund Dividend Division)
 - Department of Fish & Game (Division of Wildlife Conservation)
 - Department of Public Safety (Division of Alaska State Troopers)
 - Department of Health (still investigating)
 - Department of Environmental Conservation
 - Department of Military and Veterans Affairs
 - Department of Law
- Plaintiff the Commonwealth of Puerto Rico identifies the Oficina de Compensación y Servicios a las Víctimas y Testigos de Delitos and the Sistema de Información de Justicia Criminal of the Puerto Rico Department of Justice (“PRDOJ”) as the only subdivisions of the PRDOJ that used Display Advertising during the relevant period.
 - The Offices of the Attorneys General for the Plaintiff States of Texas, Idaho, Florida, Mississippi, Missouri, Montana, South Carolina, and South Dakota have not purchased display advertising or used ad tech products during the Relevant Period.

INTERROGATORY NO. 2: Identify all remedies You seek in this Action, in what capacity (such as *parens patriae* or sovereign capacity) You seek each remedy, and the statutory or other legal basis for each such remedy.

Response: The Plaintiff States object to this interrogatory to the extent it seeks to force a legal conclusion. Further, the Plaintiff States object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing, including review of documents or data not timely collected and only recently or not yet produced by Google, and to the extent it seeks to compel Plaintiffs to marshal all of their evidence in advance of trial. The Plaintiff States also object on the basis that this request calls for the premature disclosure of expert opinions. Expert disclosures will be made within the time prescribed by the Court’s Scheduling Order. The Plaintiff States reserve their rights to supplement responses to this interrogatory at a later date once they have designated experts and obtained sufficient discovery to make a complete response. Subject to and without waiving the foregoing objections, the Plaintiff States respond:

- The Plaintiff States reserve the right to pursue any allowable remedy under federal or state antitrust law that would restore competition to any market in which

Google's conduct is alleged to have anticompetitive effects. The Plaintiff States currently believe that a combination of structural and behavioral remedies are necessary to restore competitive conditions to the affected markets.

- The Plaintiff States reserve the right to pursue any allowable remedy under their respective state laws for Google's deceptive conduct in order to compensate the injured citizens or persons of their state and to deter future deceptive conduct on the part of Google.
- The Plaintiff States each seek injunctive relief in their *parens patriae* capacity for harm to their general welfare and economies.
- The Plaintiff States each seek civil penalties in their sovereign and *parens patriae* capacity for harm to their general welfare and economies.
- Subject to the foregoing responses and objections and reservations of rights, Plaintiff States have the present intent to pursuing those remedies identified in Exhibit "B".
- For the avoidance of doubt, the Plaintiff States emphasize that the foregoing responses pertain only to the *remedies* sought under their state law authorities and do not purport to address or modify the *injuries* that the Plaintiff States allege in the Fourth Amended Complaint.

INTERROGATORY NO. 3: Identify all persons answering and supplying information in response to these Interrogatories and all documents You relied on to answer these Interrogatories.

Response: The Plaintiff States object to this interrogatory to the extent it seeks attorney-client or work product privileged information, or to the extent it seeks information not otherwise discoverable under court order. The Plaintiff States will supplement their responses to this interrogatory at a later date if they have responsive information. Subject to and without waiving the foregoing objections, the Plaintiff States respond:

- Plaintiff States that responded to Interrogatory No. 28 also identify those individuals as being potentially responsive to this Interrogatory No. 3.
- Staff attorneys for the respective Attorneys General of the Plaintiff States or outside counsel representing certain of the Attorneys General of the Plaintiff States were involved in preparing these responses.
- The Plaintiff State of Florida specifically responds that it consulted with the following employees of the Florida Attorney General's Office in formulating these responses: Douglas Smith and Cindy Rutledge (Information Technology); Sabrina

Dated: May 3, 2024

Respectfully submitted,

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